

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

SIERRA BOUCHER, LILY ENGEBRECHT,
NATASSIA TUHOVAK, HANNAH WHELAN,
and CASSIDY WOOD,

Plaintiffs,

Case No. 1:22-cv-00381-CCR

-against-

TRUSTEES OF CANISIUS COLLEGE,

Defendants.

JOINT MOTION TO MODIFY CASE MANAGEMENT ORDER

Defendant Canisius University and Plaintiffs jointly request an amendment of the Case Management Order dated August 17, 2023 (Docket No. 21), which was modified by Court Order on September 13, 2024 (Docket No. 30). We respectfully seek a brief enlargement of the dispositive motion deadline.

This is the third time the parties have requested a brief enlargement of time. This Motion, which seeks a two-week adjournment of the pretrial dispositive motion deadline, is necessitated by the fact that the parties have not yet received all deposition transcripts from the court reporter. The last deposition took place on October 7, 2024 and discovery closed on October 11, 2024.

Counsel for the parties have been reasonably diligent and cooperative in the discovery process. We have exchanged interrogatories and responses, and have exchanged in excess of 9,000 pages of documents, including ESI maintained by more than a dozen separate custodians, including several former students and former employees. There have been depositions of 15 individuals.

Therefore, the parties respectfully request the following enlargement of time:

- Pretrial dispositive motions shall be filed by no later than **December 16, 2024**
- Plaintiffs' opposition shall be filed by no later than **January 30, 2025**

The parties appreciate the Court's continued time and attention to this matter, and if these enlarged deadlines are acceptable to the Court, we respectfully request that they be So Ordered.

Dated: November 14, 2024

LAW OFFICE OF DANIELA NANAU, P.C.

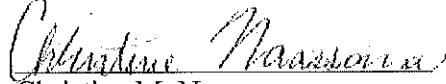
Daniela Nanau



89-03 Rutledge Avenue
Glendale, New York 11385
(888) 404-4975
Attorneys for Plaintiffs

HODGSON RUSS LLP

Thomas S. D'Antonio



Christine M. Naassana
1800 Bausch & Lomb Place
Rochester, New York 14604
(585) 454-0758
Attorneys for Defendants

SO ORDERED:

Dated: Nov. 15, 2024



Hon. Christina Reiss
United States District Judge